

1 Through their undersigned counsel, Defendants Google LLC and YouTube, LLC and
2 Plaintiffs (the Parties) do hereby agree and stipulate as follows:

3 1. WHEREAS, the Parties previously agreed to extend the deadlines to brief any
4 deficiency dispute for the M source and any dispute concerning a stipulation regarding the
5 authenticity and admissibility of YouTube's productions from the F Source, L Source, A Source,
6 B Source, and M Source, to June 27, 2025, and the Court granted the Parties' requested schedule,
7 Dkt. 2018; and

8 2. WHEREAS, the Parties previously agreed to extend the deadlines to brief any
9 deficiency dispute for the M source and any dispute concerning a stipulation regarding the
10 authenticity and admissibility of YouTube's productions from the F Source, L Source, A Source,
11 B Source, and M Source, to July 16, 2025, and the Court granted the Parties' requested schedule,
12 Dkt. 2088; and

13 3. WHEREAS, the Parties previously agreed to extend the deadlines to brief any
14 deficiency dispute for the M source and any dispute concerning a stipulation regarding the
15 authenticity and admissibility of YouTube's productions from the F Source, L Source, A Source,
16 B Source, and M Source, to July 30, 2025, and the Court granted the Parties' requested schedule,
17 Dkt. 2109; and

18 4. WHEREAS, the Parties have reached a resolution on disputes concerning
19 YouTube's searches of the M source under which YouTube's additional productions have not yet
20 been completed and are continuing to meet and confer to reach resolution on any disputes
21 concerning a stipulation regarding the authenticity and admissibility of YouTube's productions
22 therefrom;

23 **NOW, THEREFORE**, the Parties hereby jointly stipulate and request that the Court
24 approve the Parties' proposed briefing schedule extension as follows:

- 25 1. Four (4) business days after YouTube completes its final productions from the M
26 Source:

a. The Parties will finalize any stipulation regarding the authenticity and admissibility of YouTube's productions or else identify any remaining disputes;

b. Plaintiffs will identify any deficiencies in the completed production in writing.

2. Five (5) business days later: Briefs due for any remaining disputes as to the production or stipulation.

IT IS SO STIPULATED, through Counsel of Record.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

Honorable Peter H. Kang
United States District Judge

Dated: July 30, 2025

Respectfully submitted,

**WILSON SONSINI GOODRICH & ROSATI
Professional Corporation**

/s/ Christopher Chiou

Christopher Chiou (State Bar No. 233587)
Wilson Sonsini Goodrich & Rosati
cchiou@wsgr.com
Matthew K. Donohue (State Bar No. 302144)
mdonohue@wsgr.com
633 West Fifth Street
Los Angeles, CA 90071-2048
Telephone: (323) 210-2900
Facsimile: (866) 974-7329

Brian M. Willen, *pro hac vice*
Wilson Sonsini Goodrich & Rosati
bwillen@wsgr.com
1301 Avenue of the Americas, 40th Floor
New York, New York 10019
Telephone: (212) 999-5800
Facsimile: (212) 999-5899

Lauren Gallo White (State Bar No. 309075)

Wilson Sonsini Goodrich & Rosati
lwhite@wsgr.com
Andrew Kramer (State Bar No. 321574)
akramer@wsgr.com
Carmen Sobczak (State Bar No. 342569)
csobczak@wsgr.com
One Market Plaza, Spear Tower, Suite 3300
San Francisco, CA 94105
Telephone: (415) 947-2000
Facsimile: (415) 947-2099

MORGAN, LEWIS & BOCKIUS LLP

Yardena R. Zwang-Weissman (SBN 247111)
yardena.zwang-weissman@morganlewis.com
300 South Grand Avenue, 22nd Floor
Los Angeles, CA 90071-3132
Telephone: (213) 612-7238

Brian Ercole (*pro hac vice*)
brian.ercole@morganlewis.com
600 Brickell Avenue, Suite 1600
Miami, FL 33131-3075
Telephone: (305) 415-3416

Stephanie Schuster (*pro hac vice*)
Stephanie.schuster@morganlewis.com
1111 Pennsylvania Avenue NW
Washington, DC 20004-2541
Telephone: (202) 373-6595

WILLIAMS & CONNOLLY LLP

Joseph G. Petrosinelli
jpetrosinelli@wc.com
Ashley W. Hardin
ahardin@wc.com
680 Maine Avenue, SW
Washington, DC 20024
Telephone: (202) 434-5000
Facsimile: (202) 434-5029

*Attorneys for Defendants YouTube, LLC,
and Google LLC*

Dated: July 30, 2025

/s/ Lexi J. Hazam
LEXI J. HAZAM
**LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP**
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339

Telephone: 415-956-1000
lhazam@lchb.com

PREVIN WARREN
MOTLEY RICE LLC
401 9th Street NW Suite 630
Washington DC 20004
Telephone: 202-386-9610
pwarren@motleyrice.com

Co-Lead Counsel

CHRISTOPHER A. SEEGER
SEEGER WEISS, LLP
55 Challenger Road, 6th floor
Ridgefield Park, NJ 07660
Telephone: 973-639-9100
Facsimile: 973-679-8656
cseeger@seegerweiss.com

Counsel to Co-Lead Counsel and Settlement
Counsel

JENNIE LEE ANDERSON
ANDRUS ANDERSON, LLP
155 Montgomery Street, Suite 900
San Francisco, CA 94104
Telephone: 415-986-1400
jennie@andrusanderson.com

Liaison Counsel

JOSEPH G. VANZANDT
**BEASLEY ALLEN CROW METHVIN
PORTIS & MILES, P.C.**
234 Commerce Street
Montgomery, AL 36103
Telephone: 334-269-2343
joseph.vanzandt@beasleyallen.com

EMILY C. JEFFCOTT
MORGAN & MORGAN
220 W. Garden Street, 9th Floor
Pensacola, FL 32502
Telephone: 850-316-9100
ejeffcott@forthepeople.com

Federal/State Liaison Counsel

MATTHEW BERGMAN
SOCIAL MEDIA VICTIMS LAW CENTER
821 Second Avenue, Suite 2100
Seattle, WA 98104

1 Telephone: 206-741-4862
2 matt@socialmediavictims.org

3 JAMES J. BILSBORROW
4 **WEITZ & LUXENBERG, PC**
5 700 Broadway
6 New York, NY 10003
7 Telephone: 212-558-5500
8 Facsimile: 212-344-5461
9 jbilborrow@weitzlux.com

10 JAYNE CONROY
11 **SIMMONS HANLY CONROY LLP**
12 112 Madison Ave, 7th Floor
13 New York, NY 10016
14 Telephone: 917-882-5522
15 jconroy@simmonsfirm.com

16 ANDRE MURA
17 **GIBBS LAW GROUP, LLP**
18 1111 Broadway, Suite 2100
19 Oakland, CA 94607
20 Telephone: 510-350-9717
21 amm@classlawgroup.com

22 ALEXANDRA WALSH
23 **WALSH LAW**
24 1050 Connecticut Ave, NW, Suite 500
25 Washington D.C. 20036
26 Telephone: 202-780-3014
27 awalsh@alexwalshlaw.com

28 MICHAEL M. WEINKOWITZ
LEVIN SEDRAN & BERMAN, LLP
510 Walnut Street Suite 500
Philadelphia, PA 19106
Telephone: 215-592-1500
mweinkowitz@lfsbalw.com

Plaintiffs' Steering Committee Leadership

RON AUSTIN
RON AUSTIN LAW
400 MANHATTAN BLVD
HARVEY, LA 70058
Telephone: 504-227-8100
raustin@ronaustinlaw.com

PAIGE BOLDT
WATTS GUERRA LLP
4 Dominion Drive, Bldg. 3, Suite 100
San Antonio, TX 78257
Telephone: 210-448-0500

1 PBoldt@WattsGuerra.com

2 THOMAS P. CARTMELL
3 **WAGSTAFF & CARTMELL LLP**
4 4740 Grand Avenue, Suite 300
5 Kansas City, MO 64112
6 Telephone: 816-701 1100
7 tcartmell@wcllp.com

8 SARAH EMERY
9 **HENDY JOHNSON VAUGHN EMERY, PSC**
10 2380 Grandview Drive
11 Ft. Mitchell, KY 41017
12 Telephone: 888-606-5297
13 semery@justicestartshere.com

14 CARRIE GOLDBERG
15 **C.A. GOLDBERG, PLLC**
16 16 Court St.
17 Brooklyn, NY 11241
18 Telephone: (646) 666-8908
19 carrie@cagoldberglaw.com

20 RONALD E. JOHNSON, JR.
21 **HENDY JOHNSON VAUGHN EMERY, PSC**
22 600 West Main Street, Suite 100
23 Louisville, KY 40202
24 Telephone: 859-578-4444
25 rjohnson@justicestartshere.com

26 SIN-TING MARY LIU
27 **AYLSTOCK WITKIN KREIS &**
28 **OVERHOLTZ, PLLC**
17 East Main Street, Suite 200
Pensacola, FL 32502
Telephone: 510-698-9566
mliu@awkolaw.com

JAMES MARSH
MARSH LAW FIRM PLLC
31 Hudson Yards, 11th floor
New York, NY 10001-2170
Telephone: 212-372-3030
jamesmarsh@marshlaw.com

HILLARY NAPPI
HACH & ROSE LLP
112 Madison Avenue, 10th Floor
New York, New York 10016
Telephone: 212.213.8311
hnappi@hrsclaw.com

1 EMMIE PAULOS
2 **LEVIN PAPANTONIO RAFFERTY**
3 316 South Baylen Street, Suite 600
4 Pensacola, FL 32502
5 Telephone: 850-435-7107
6 epaulos@levinlaw.com

7 RUTH THI RIZKALLA
8 **THE CARLSON LAW FIRM, P.C.**
9 1500 Rosecrans Ave., Ste. 500
10 Manhattan Beach, CA 90266
11 Telephone: 415-308-1915
12 rrizkalla@carlsonattorneys.com

13 ROLAND TELLIS
14 DAVID FERNANDES
15 **BARON & BUDD, P.C.**
16 15910 Ventura Boulevard, Suite 1600
17 Encino, CA 91436
18 Telephone: (818) 839-2333
19 Facsimile: (818) 986-9698
20 rtellis@baronbudd.com
21 dfernandes@baronbudd.com

22 MELISSA YEATES
23 JOSEPH E. MELTZER
24 **KESSLER TOPAZ MELTZER & CHECK, LLP**
25 280 King of Prussia Road
26 Radnor, PA 19087
27 Telephone: 610-667-7706
28 myeates@ktmc.com
jmelzer@ktmc.com

DIANDRA "FU" DEBROSSE ZIMMERMANN
DICELLO LEVITT
505 20th St North Suite 1500
Birmingham, Alabama 35203
Telephone: 205.855.5700
fu@dicellolevitt.com

Plaintiffs' Steering Committee Membership
Attorneys for Plaintiffs

ATTESTATION

I, Audrey Siegel hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: July 30, 2025

/s/ Audrey Siegel

Audrey Siegel